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Attorneys for Defendants

JAMES S. COLLETTO and JOHN V. COLLETTO, as Successor Co-trustees of the JOSEPH S. COLLETTO and ANN D. COLLETTO TRUST dated November 1, 1988, specifically as to Trust B of Said Trust

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

IRMA RAMIREZ; and DAREN HEATHERLY,

Plaintiff(s),

v.

TAQUERIA SANTA ROSA #1; JAMES S. COLLETTO and JOHN V. COLLETTO, as Successor Co-trustees of the JOSEPH S. COLLETTO and ANN D. COLLETTO TRUST, dated November 1, 1988, specifically as to Trust B of Said Trust; and FRANCISCO G. SAHAGUN, an individual dba TAQUERIA SANTA ROSA #1,

Defendant(s).

Case No. C13-05900-PJH

JOINT STIPULATION TO EXTEND THE DEADLINE FOR CONDUCTING A MEDIATION (ADR L.R. 6-5)

Complaint Filed: December 19, 2013

TO THE HONORABLE COURT:

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The parties hereto, Plaintiffs IRMA RAMIREZ; and DAREN HEATHERLY, and 2 Defendants JAMES S. COLLETTO and JOHN V. COLLETTO, as Successor Co-trustees of the 3 JOSEPH S. COLLETTO and ANN D. COLLETTO TRUST dated November 1, 1988, 4 specifically as to Trust B of Said Trust, and FRANCISCO G. SAHAGUN, an individual dba 5 TAQUERIA SANTA ROSA #1, by and through their counsel of record, hereby stipulate as 6 follows: 7 WHEREAS, this matter was referred to mediation on May 23, 2014; 8 WHEREAS, mediator John Vrieze was appointed mediator on June 27, 2014; 9 WHEREAS, the joint telephone conference, per ADR L.R. 6.6, was held by mediator 10 John Vrieze, with counsel for the various parties, on July 23, 2014, during the course of which 11 potential mediation dates were discussed. However, due to trial dates and related commitments, 12 plaintiffs' counsel was unavailable on the dates proposed by mediator John Vrieze for the 13 mediation. 14 WHEREAS, subsequent discussions have yet to result in an exact date for mediation; 15 although, the likely date appears to lie in the last part of October or the first part of November, 2014. 16 17 WHEREAS, the parties have agreed, pending approval by this Court, that the deadline for 18 conducting the mediation be extended to November 30, 2014. 19 WHEREAS, there have been no prior extension of the deadline for conducting the 20 mediation. 21 WHEREAS, Plaintiffs and Defendants do not anticipate that this extension of time will 22 alter the date of any event or any deadline already fixed by Court order. 23 IT IS HEREBY STIPULATED by and between Plaintiffs and Defendants through their 24 respective counsel of record that the deadline for conducting the mediation be extended to 25 November 30, 2014. 26 27 28

IT IS SO STIPULATED	
Dated: August 27, 2014	AARON & WILSON, LLP
Dated: August 27, 2014	By
	By
Dated: August 27, 2014	THE FRANKOVICH GROUP
Dated: August 27, 2014	By/S/_ THOMAS E. FRANKOVICH Attorneys for Plaintiffs IRMA RAMIREZ; and DAREN HEATHERLY
8/28/14  STREE DISTRICTOR  TT IS SO ORDERED  Judge Phyllis J. Hamilton	By
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I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document.

Dated: August 27, 2014 AARON & WILSON, LLP

By ROBERT'S AARON

ROBERT S. AARON

Attorneys for Defendants

JAMES S. COLLETTO and JOHN V.

COLLETTO, as Successor Co-trustees of
the JOSEPH S. COLLETTO and ANN D.

COLLETTO TRUST dated November 1,
1988, specifically as to Trust B of Said
Trust

CERTIFICATE OF SERVICE 1 2 STATE OF CALIFORNIA, CITY AND COUNTY OF SAN FRANCISCO 3 I, Robert S. Aaron, declare: I am a citizen of the United States, over 18 years of age and not a party to the within 4 action. I am self-employed in the City and County of San Francisco; my business address is 150 Post Street, Suite 400, San Francisco, California, 94108. 5 On August 27, 2014, I served the attached and/or enclosed: 6 JOINT STIPULATION TO EXTEND THE DEADLINE FOR CONDUCTING A 7 **MEDIATION (ADR L.R. 6-5)** 8 on all parties in this action, at the following address(es): 9 William W. Hatcher, Jr., Esq. Thomas E. Frankovich, Esq. 10 Hatcher & Rundel The Frankovich Group 114 Pierce Street The Vinyard 4328 Redwood Highway, Suite 300 11 Santa Rosa, CA 95404 Fax: (707) 545-0220 Tel: (707) 542-1921 Email: whatcher@sonic.net San Rafael, CA 94903 12 Fax: (415) 674-9900 Tel: (415) 444-5800 Email: tfrankovich@disabilitieslaw.corn Co-Counsel for Defendants, James S. Colletto 13 and John Colletto, as Successor Co-trustees of Counsel for Plaintiffs, Irma Ramirez and Daren 14 the Joseph S. Colletto and Arm D. Colletto Heatherly Trust dated November 1, 1988, specifically as 15 to Trust B of Said Trust Marvin Pederson, Esq. 16 1160 North Dutton Avenue, Suite 150 17 Santa Rosa, CA 95401 Fax: (707) 544-5829 Tel: (707) 544-9444 18 Email: pederson@marvlaw.corn 19 Counsel for Co-Defendant, Taqueria Santa Rosa 20 Service was accomplished by causing either an original or a true copy of the abovereferenced document(s) to be distributed as follows: 21 BY MAIL: I caused such document(s) to be placed in a sealed envelope, addressed as 22 indicated above, with prepaid first-class postage thereon, and then placed the envelope(s) for collection and mailing, in accordance with the firm's ordinary business practice. I am readily 23 familiar with the firm's ordinary business practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice 24 correspondence for mailing is deposited with United States Postal Service on the date indicated for service, with prepaid first-class postage thereon. 25 BY HAND DELIVERY: I caused such documents to be hand delivered to the addresses 26 indicated above. 27 VIA FACSIMILE: I caused such documents to be transmitted via facsimile to the parties indicated above, at their respective facsimile numbers. 28

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2	VIA EXPRESS CARRIER: I caused such documents to be collected by an agent for the United States Postal Service, United Parcel Service, Federal Express or other overnight carrier, to be delivered by way of overnight mail to the addresses indicated above.						
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4	E-MAIL. I caused such documents to be transmitted via e-mail to the parties indicated above, at their respective e-mail addresses through the E-Filing website.						
5	I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.						
6	Executed on August 27, 2014, at San Francisco, California.						
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8	/S/						
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